

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CARTIER, division of RICHEMONT :
NORTH AMERICA, INC.; and :
CARTIER INTERNATIONAL, N.V., :

Plaintiffs,

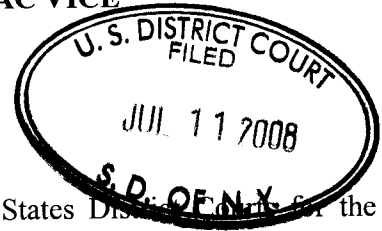
v.

SEAH LLC; SKYMALL, INC.; and :
JOHN DOES 1-10, :

Defendants. :
-----X

Civil Action No. 08-CV-4471 (LAK)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**



PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, Ellie A. Levy, Esq., a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission pro hac vice of


Frank Herrera, Esq.
Rothstein Rosenfeldt Adler
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33301
(954) 522-3456-telephone
(954) 527-8663-facsimile

Frank Herrera is a member in good standing of the Bar of the States of Florida.
There are no pending disciplinary proceedings against Frank Herrera in any State or Federal court.

Dated: 7/7/08

Fort Lauderdale, Florida

Respectfully submitted,



Ellie A. Levy, Esq.
SDNY Bar No.: EL3193
Rothstein Rosenfeldt Adler
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33301
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Civil Action No. 08-CV-4471 (LAK)

**AFFIDAVIT OF ELLIE LEVY IN
SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

State of Florida)
)
County of Broward)

ss:

Ellie Levy, being duly sworn, hereby deposes and says as follows:

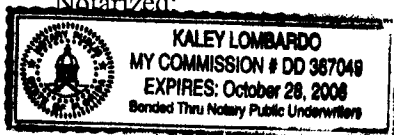
1. I am an attorney at Rothstein Rosenfeldt Adler, counsel for Defendants, Seah, LLC and Skymall, Inc. ("Defendants") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Frank Herrera as counsel pro hac vice to represent Defendants in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in July 23, 2002. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Frank Herrera since the beginning of this year.
4. Mr. Herrera is a partner at Rothstein Rosenfeldt Adler, in Fort Lauderdale, Florida.
5. I have found Mr. Herrera to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Frank Herrera, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Frank Herrera, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Frank Herrera, pro hac vice, to represent Defendants in the above captioned matter, be granted.

Dated: July 7, 2008

City, State: FORT LAUDERDALE, FL

Notarized:



Respectfully submitted,

Ellie A. Levy, Esq.
SDNY Bar No.: EL3193

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Civil Action No. 08-CV-4471 (LAK)

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Ellie Levy, attorney for Defendants, Seah, LLC and Skymall, Inc., and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Frank Herrera, Esq.
Rothstein Rosenfeldt Adler
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33301
(954) 522-3456 / (954) 527-8663
FHerrera@rra-law.com

is admitted to practice pro hac vice as counsel for Defendants, Seah, LLC and Skymall, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall immediately apply for an Electronic Case Filing password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

New York, NY

United States District/Magistrate Judge



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 494801
Frank Herrera
Rothstein Rosenfeldt Adler
401 E. Las Olas Blvd., Ste. 1650
Ft Lauderdale, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on September 10, 2001.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 3 day of July, 2008.

Johnny M. Smith
Assistant Director, Membership Records
The Florida Bar

LMS/KLW5:R106

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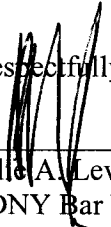
Civil Action No. 08-CV-4471 (LAK)

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the Motion for Admission Pro Hac Vice, Affidavit, Certificate of Good Standing, and Proposed Order for Admission Pro Hac Vice was sent via Facsimile and U.S. Mail on this 7th day of July, 2008, to: David L. Ferguson, Esq. and Jonathan M. Streisfeld, Esq., THE KOPELOWITZ OSTROW FIRM, P.A., 200 SW 1st Avenue, Suite 1200, Fort Lauderdale, FL 33301, (954)523-2872; Richard E. Weltman, Esq., WELTMAN & MOSKOWITZ, L.L.P., 270 Madison Avenue, Suite 1400, New York, NY 10016, (212) 684-7995; Tal S. Benschar, Esq. and Milton Springut, Esq., KALOW & SPRINGUT, L.L.P., 488 Madison Avenue, New York, NY 10022, (212) 813-9600.

Respectfully submitted,



Elliot A. Levy, Esq.
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